

**Attachment M -
Richmond District Maintenance Yard**

**VDOT MS4 (General Permit No. VAR04)
Richmond District Complex Facility
VDOT District No. 4**

Facility Name: Richmond District Complex Facility
Location: 2430 Pine Forest Drive, Colonial Heights, VA, 23834
Latitude: N 37.290332* **Longitude** W 77.40543*

Date of Visit: October 22, 2012
Entry Time: 2:00 p.m. (approx)
Exit Time: 5:00p.m. (approx)

Site Owner and/or Operator: VDOT-Richmond District

Site Contacts: Randy Bagley (Facility Manager, VDOT) and Roger Williams (Fleet Operations Manager, VDOT)

Conducted by: Bobby Jacobsen (PG Environmental, LLC), Chuck Schadel (U.S. EPA Region 3), and Kyle Zieba (U.S. EPA Region 3)

Accompanied by: Jeff Selengut (Permit Writer, Virginia OCR), Jacob Bauckman (Virginia OCR), Roy Mills (Program Administrator, VDOT), Sharon Harless (VDOT Consultant, EEE Consulting, Inc.), Ian Frost (VDOT Consultant, EEE Consulting, Inc.), Ed Wallingford, (VDOT),

Site Visit Report Prepared by: Bobby Jacobsen (PG Environmental, LLC)

On October 22, 2012, the EPA Inspection Team inspected the Richmond District Complex Facility (hereinafter, Facility). Randy Bagley (Facility Manager, VDOT) explained that the Complex oversee the Residencies, and the Residencies over see the Road subcontractors and the satellite facilities. Dry weather conditions were experienced throughout the inspection activities. Weather history reports from the National Oceanic and Atmospheric Administration station Richmond Int AP - 44-7201 indicated that on 10/19/2012, 0.05" of precipitation occurred, on 10/18/2012, trace amounts of precipitation occurred, and 0.68" of precipitation occurred, 10/19/2012, 0.15" of precipitation occurred.

Based on a review and comparison of the Facility location and the United States Census 2000 Urbanized Area designation, it was determined that the Facility is located within the urbanized area. The Facility comprises multiple buildings (e.g., office buildings, vehicle maintenance building, sign shop, storage buildings), a vehicle fueling island, a bulk fueling station, and vehicle/equipment storage areas. Various activities are conducted at the Facility, including the following: vehicle washing, storage, repair, and fueling, sign fabrication, paint management for road marking activities, and bulk fueling. Stormwater runoff from the Facility is primarily conveyed to multiple points of discharge along the northern perimeter of the site which discharge to conveyances that flow to Timsbury Creek. There is an on-site pond that receives stormwater runoff from storm drain inlets on the interior of the site and discharges to Timsbury Creek. In addition, a point of discharge was identified in the southeastern corner of the site near the bulk fueling area.

¹ Sign-in sheets for the site visit are provided after the photograph log.

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The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the Facility:


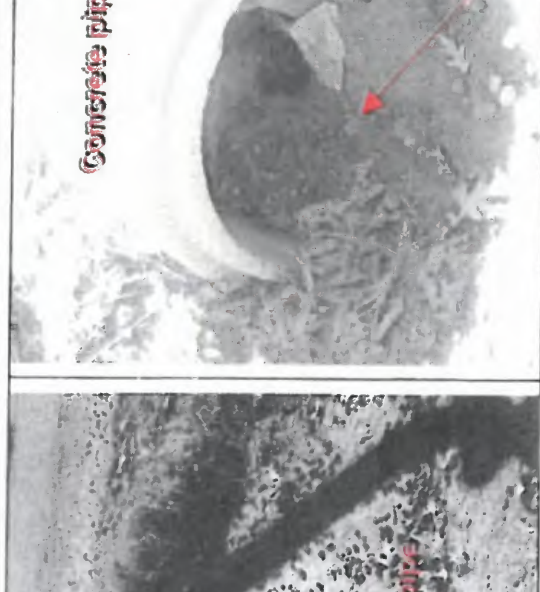
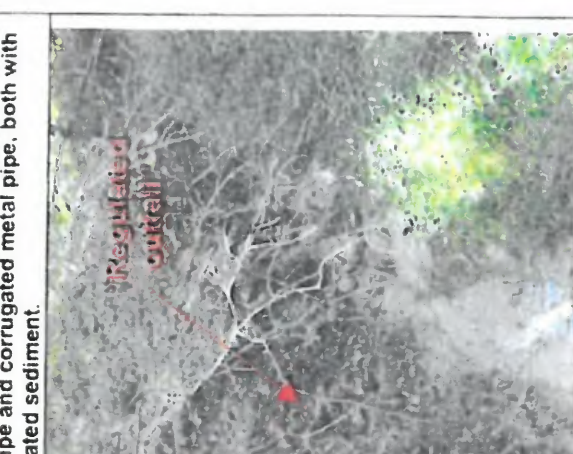

1. The VDOT Facility Manager explained that [NOTE: Bagely stated there are no records of inspections] formal documented inspections of the Facility for pollution prevention and good housekeeping are not conducted on a regular basis. He added that staff from the "Environmental Section" in the office buildings at the Facility periodically walk through the Facility and identify issues which must be addressed, but this is not documented.
2. The VDOT Consultant stated that at the time of the inspection a formal plan for addressing stormwater pollution prevention and good housekeeping at the Facility had not been developed or implemented (e.g., Stormwater Pollution Prevention Plan). He added that a draft Stormwater Pollution Prevention Plan (SWPPP) was being prepared in preparation for the issuance of the next MS4 permit.
3. The VDOT Consultant stated that EEE Consulting, Inc. has conducted mapping of the storm system at the Facility, including "regulated outfalls" and "points of discharge." He explained that "regulated outfalls" are where a conveyance enters a waterbody and a "point of discharge" is where stormwater would exit the facility. He explained that EEE Consulting, Inc. submitted a draft of the information to VDOT during the week prior to the site visit and that EEE Consulting, Inc. has been contracted to perform this activity at VDOT maintenance facilities within urbanized areas throughout the state.
4. A storm drain drop inlet located along the fence line directly north of the equipment storage shed was surrounded by unstabilized sediment and did not have BMPs for inlet protection (see Photograph 1). VDOT staff explained that the drop inlet was connected to a corrugated metal pipe which discharged beyond the Facility fence line to the north. The corrugated metal pipe was almost completely full of sediment (see Photograph 2). In addition, there was a concrete pipe adjacent to the drop inlet to convey stormwater runoff beyond the Facility fence line to the north. Accumulated sediment was observed within the downgradient end of the pipe (see Photograph 2). The VDOT Consultants from EEE Consulting, Inc. explained that these pipes would be considered "points of discharge" from the Facility which convey flow to drainage channels that ultimately discharge to Timsbury Creek. They explained that in this case, the "regulated outfall" would be the location at which the conveyance channel downgradient of the outfall pipes discharged into an unnamed waterbody that flows into Timsbury Creek (see Photographs 3 and 4).
5. A bucket of an unidentified fluid had leaked fluid onto the impervious ground surface underneath and adjacent to the bucket near the entrance door to the Materials Building (see Photographs 5 and 6). VDOT staff members present for the inspection were unsure who was responsible for the bucket but stated that it would be moved and cleaned up promptly.
6. A vehicle washing station was observed inside the vehicle maintenance building at the Facility (see Photograph 7). VDOT staff stated that the floor drain in the washing station is connected to an oil-water separator and discharges to the sanitary sewer (see Photograph 8). The VDOT Consultants from EEE Consulting, Inc. stated that VDOT has an "Industrial User" agreement with Chesterfield County to accept discharges from the oil-water separator to the County's sanitary sewer system and wastewater treatment plant (WWTP). The EPA Inspection Team requested a copy of the agreement in a formal records request on October 26, 2012. In response, VDOT provided the following explanation:

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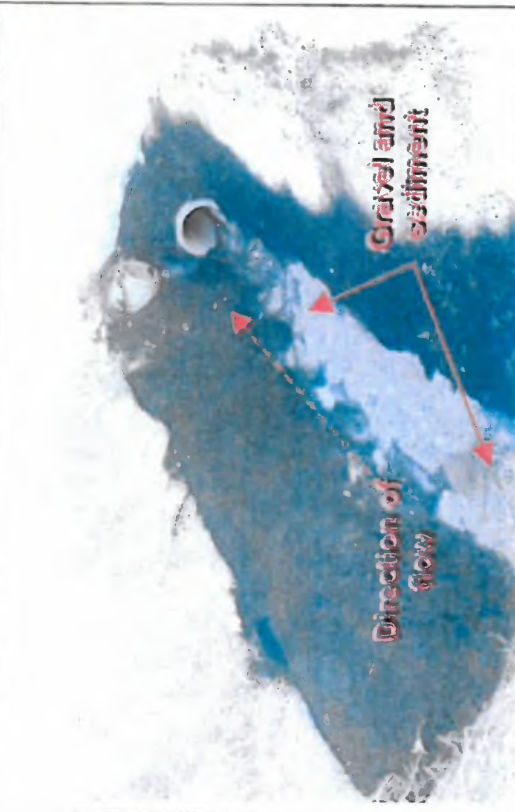
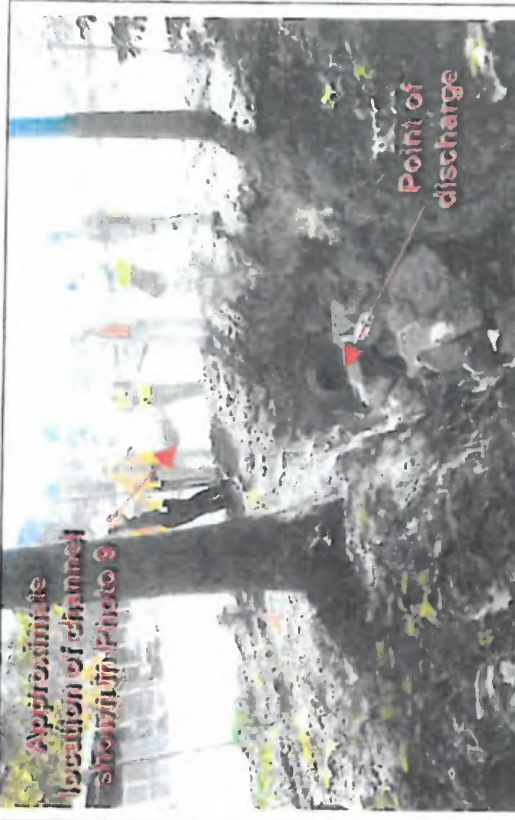

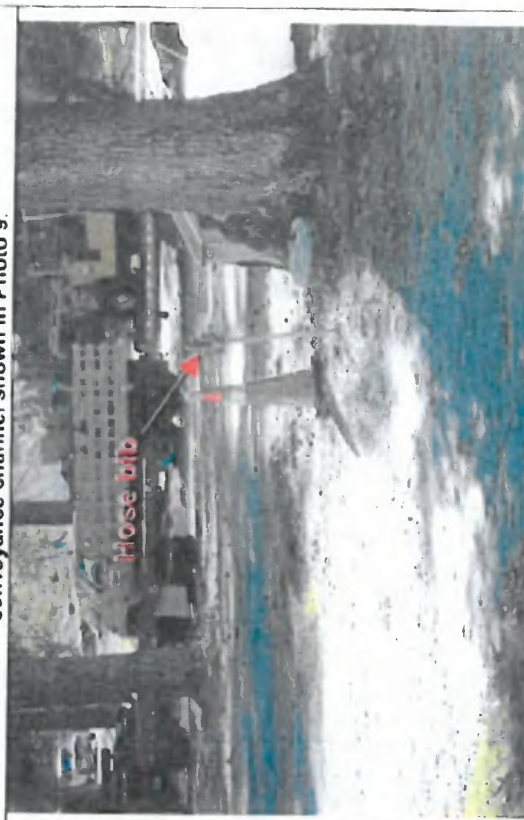
"VDOT has discussed the Richmond District Complex with the Chesterfield County Pre-treatment coordinator, and they do not require a permit or agreement to discharge to their system for the O/W separators. Rather they have stated that VDOT just has to meet the current limits for discharges to the South Central Wastewater Authority (SCWWA)."

The EPA Inspection Team did not discuss in detail VDOT's maintenance procedures to ensure that the oil-water separator is properly maintained and operated.

7. Sediment and gravel was observed in an asphalt-lined conveyance channel upgradient of a point of discharge from the facility along the northern fence line located to the northwest of the equipment storage shed in the northern portion of the site (see Photographs 9 and 10).
8. The VDOT Facility Manager explained that Facility staff previously conducted vehicle and equipment washing in two outdoor areas at the Facility--(one in the eastern portion and one in the western portion of the Facility, but about one month prior to the EPA inspection, they had been instructed not to wash vehicles or equipment outside. Both outdoor washing locations were within about 50 feet of the storm drain inlets (see Photographs 11 through 14). The VDOT Facility Manager explained that staff were instructed to wash vehicles and equipment in the indoor washing station or go to the Chester Area Headquarters Facility to conduct washing activities. He added that VDOT was working on plans to install an engineered outdoor wash pad at the Facility within a couple weeks of the site visit. VDOT staff explained that the Virginia Department of Environmental Quality (DEQ) had approved a wash pad design that allowed for wash water to be captured on site and infiltrate into the ground surface.
9. The VDOT Fleet Operations Manager explained that the Facility staff did not have a standard protocol or schedule for determining when the spill containment system in the bulk fueling area and bulk fuel unloading area should be maintained (i.e., solids cleaned out from system). He stated that the two staff members which work in the bulk fueling area conduct visual inspections and determine when the system should be maintained. He added that he believed the last time it was cleaned out was at the beginning of 2011. Trench drains were present in the bulk fueling area which connected to additional trench drains downgradient in the bulk fuel unloading area (see Photographs 15, 16, and 17). The VDOT Fleet Operations Manager explained that the trench drain containment system is equipped with a shutoff valve that is kept closed when fueling and fuel loading and unloading operations are taking place, and open at other times to allow stormwater runoff to be conveyed through the trench drain system outlet and off site (see Photographs 18, 19, and 20). The outlet would convey flow through two pipes near the fence line in the southeastern corner of the Facility (see Photographs 21 and 22). Timsbury Creek is located about 100 yards to the east of the fence line of the Facility in this location. It was unclear to the EPA Inspection Team whether EEE Consulting, Inc. had identified this location as a "point of discharge" from the facility. The VDOT Fleet Operations Manager explained that if stormwater were accumulated in the trench drain containment system, it would be tested with "fuel indicator paste" to determine the presence or absence of petroleum products in the water prior to discharge. The VDOT Fleet Operations Manager stated that if petroleum products were detected in the accumulated water, the Facility would have a local waste disposal company pump out the fluid and dispose of it, or the Facility would pump the fluid to 55-gallon drums which would then be picked up for disposal.

Site Photographs	VDOT MS4 (General Permit No. VAR04) Richmond District Complex Facility VDOT District No. 4	Photograph Date: 10/22/2012
		<p>Photograph 1 – View of storm drain inlet north of the equipment storage shed. Note unstabilized sediment surrounding the inlet.</p>
		<p>Photograph 3 – View of conveyance downgradient of "point of discharge" shown in Photos 1 and 2.</p> <p>Photograph 4 – View of what EEE Consulting, Inc. considered the "regulated outfall" associated with the point of discharge in Photos 1 and 2.</p>

Site Photographs	VDOT MS4 (General Permit No. VAR04) Richmond District Complex Facility VDOT District No. 4	Photograph Date: 10/22/2012
		<p>Photograph 5 – View of unidentified leaked fluid from bucket near entrance to Materials Survey building.</p>
		<p>Photograph 7 – View of vehicle washing station inside the vehicle maintenance building.</p> <p>Photograph 8 – View of access structures to oil-water separator device outside the vehicle maintenance building.</p>

Site Photographs		VDOT MS4 (General Permit No. VAR04) Richmond District Complex Facility VDOT District No. 4	Photograph Date: 10/22/2012
	Photograph 9 – View of sediment and gravel in conveyance channel northwest of the equipment storage shed.		Photograph 10 – View of point of discharge location downgradient of conveyance channel shown in Photo 9.
	Photograph 11 – View of area previously used for vehicle and equipment washing in eastern portion of facility. Note proximity of storm drain inlet.		Photograph 12 – Closer view of area previously used for vehicle and equipment washing.

Site Photographs

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Photograph Date: 10/22/2012



Photograph 13 – Closer view of storm drain inlet noted in Photo 11



Photograph 14 – View of area previously used for vehicle and equipment washing in western portion of facility. Note proximity of storm drain inlet.

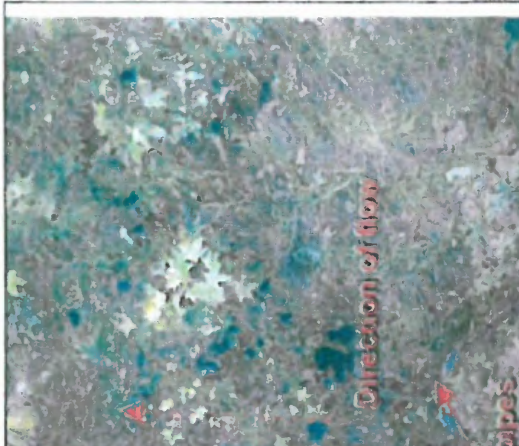
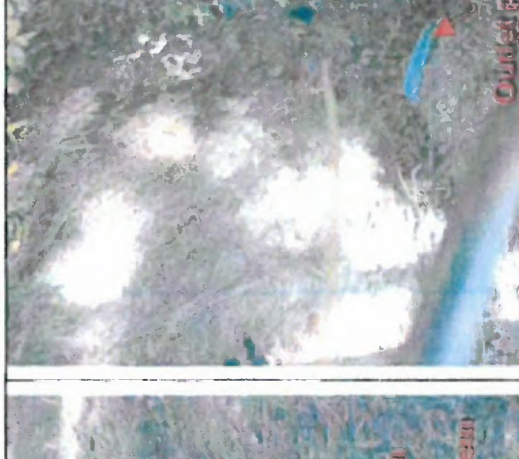


Photograph 15 – View of bulk fueling area.



Photograph 16 – View of trench drain in bulk fueling area.

Site Photographs	VDOT MS4 (General Permit No. VAR004) Richmond District Complex Facility VDOT District No. 4	Photograph Date: 10/22/2012
		<p>Photograph 17 – View of bulk fuel unloading area. Note trench drain surrounding area.</p> <p>Photograph 18 – View of trench drain and shutoff valve for outlet from trench drain containment system.</p>
		<p>Photograph 19 – View of shutoff valve operating instructions posted adjacent to shutoff valve access structure.</p> <p>Photograph 20 – View into trench drain along south side of bulk fuel unloading area.</p>

Site Photographs	VDOT MS4 (General Permit No. VAR04) Richmond District Complex Facility VDOT District No. 4	Photograph Date: 10/22/2012
 <p>Photograph 21 – View of outlet pipe from trench drain containment system and direction of flow through outlet pipes off site to the east.</p>	 <p>Photograph 22 – View of downgradient end of outlet pipes shown in Photo 21 which would be a "point of discharge" from the Facility.</p>	

Sign-in Sheet

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Site Visit Date: 10/22/2012



VIRGINIA DEPARTMENT OF TRANSPORTATION SITE VISIT ATTENDANCE RECORD

Location: Rich. Dist. Complex
 Visit Date: 10/22
 Start Time: 2:00
 End Time:
 Roster Administration Notes

First Name	Last Name	Affiliation (VDOT, EPA, EEE, etc.)	Attendees Signature
1. Ian	Evans	EEE	<i>[Signature]</i>
2. Kyle	Evans	EPA	<i>[Signature]</i>
3. Ed	Wainwright	VDOT	<i>[Signature]</i>
4. Sharon	Harless	EEE	<i>[Signature]</i>
5. Jay	Miller	VDOT	<i>[Signature]</i>
6. Jeff	Silmy	DCR	<i>[Signature]</i>
7. Ellen	Purter	DA	<i>[Signature]</i>
8. Sarah	Burkman	DA	<i>[Signature]</i>
9. Chak	Schubel	EPA 23	<i>[Signature]</i>
10. Randy	Engel	VDOT	<i>[Signature]</i>
11. Roger	Williams	VDOT	<i>[Signature]</i>
12. Kim	Sutton	EPA	<i>[Signature]</i>
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